RECORD OF COMMUNICATION	DOTHER (SPECIFY)	
	(Record of item checked above)	
TO: Ayn Schmit	FROM: Joe Dragonetti	DATE 11-21-85
Field Inspections/EPA R. 9	CONVAIR Div/Gen. Dynamic:	
SUBJECT		
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FOLIOW-up to TSCA FCB inspection at CONVAIR/General Dynamics

SUMMARY OF COMMUNICATION

Joe described the following actions which have been taken subsequent to the inspection on 11/14-15/85: Samples have been taken from the 3 adjacent transformers on the ground floor of Bldg. 1 as well as from the drip pans associated with the 2 end units. Testing of switched in Bldg. 1 will commence on 11/23-24. Switches in other locations will be sampled later. Electricians have cleaned the leaks from the transformers on the roof of Bldgs. 4 and 7. The transformer in Bhdg. 2 which was leaking at the top flange has also been cleaned. He is planning to clean and repaint all FCB transformers to facilitate effective leak detection.

The Air Force has agreed to replace the transformers on Bldgs. 4 and 7, in addition to the previously identified leaker on the Bldg. 1 messanine/ IT has been back to monitor the Bldg. 1 leaker. They took a wipe sample on the transformer deck, which was positive for PCBs. He will send a copy of the report.

He mentioned that a wipe sample was taken from the floor which was subsequently removed under the bldy. I leaker. The result was 1500 up/wipe (he deesnt't know the surface area dimension). He will send a copy of that also.

Convair has the manifests from the removal of 27 transformers 2 years ago. The removal was done by North Ager. Environmental. GE then came in and surface cleaned the steel docks under all the units before installing replacement units. There are no records re; that clean-up process — extent, solvent used, etc. Joe did observe the clean-up activities himself.

A second removal cocurred last July. This involved 3 retrofilled units. When 1 of the retrofilled units leaked, GE tested it and found that all 2 units were over 1000 1% M BCBs. The test was run in 1/33. Earliest testing after the netrofill showed that all 3 units were below 37 ppm (these was following the 90 day in-service period). Funding was requested from the Air Force and the units were removed in July by San Diego Environmental under contract to the Air Force. Convair does not have manifests conclusions, Action Taken or Required

for that removal; only the DOD forms documenting removal. These units were situated on concrete. Only surface cleaning of the concrete was performed following removal, and no verification sampling was undertaken. These areas are still exposed since the replacement transformers were put in a different location.

Joe is empling all disposal records, historical records involving the changeout of the 30 transformers, inspection records for 1983-present, sample results discussed abbve, and the 102 photographs.

INFORMATION COPIES

TO: General Dynamics file; T-5 (w/ inspection report